

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

ELIZABETH STEFFENBERG,

Plaintiff,

v.

T. GENE GILMAN, STEVEN GILMAN, THE GILMAN
INSURANCE AGENCY, INC., DAVID M. SCOLL,
ARBOR SECURITIES, LTD., ALLIANCE
INVESTMENT MANAGEMENT, COMMONWEALTH
FINANCIAL HOLDINGS INC., FINANCIAL LINKS,
INC., T. GILMAN & CO., LTD., FIRST ALLIED
SECURITIES, INC., AVIVA USA CORPORATION,
AVIVA LIFE INSURANCE COMPANY, TRADETEK,
LTD, AND TRADETEK LLC.

Defendants.

CIVIL ACTION NO. 04-40113-
FDS

**DEFENDANT DAVID M. SCOLL'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO CO-DEFENDANT AVIVA USA
CORPORATION**

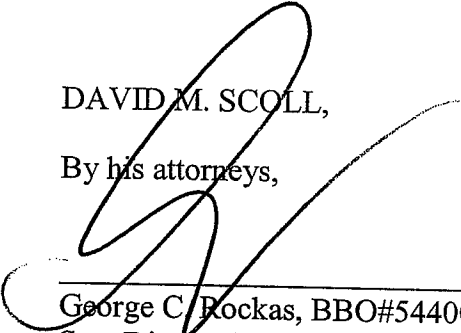
Pursuant to Rules 26.5 and 34.1 of the Local Rules of the United States District Court for the District of Massachusetts, as well as Rules 26 and 34 of the Federal Rules of Civil Procedure, the Defendant, David M. Scoll (hereinafter the "Defendant"), hereby requests that the Defendant, Aviva USA Corporation (hereinafter "Aviva"), produce for inspection, examination and copying the documents listed below within thirty (30) days of service of this request at the offices of George C. Rockas, Esq., Wilson, Elser, Moskowitz, Edelman & Dicker LLP, 155 Federal Street, Boston, MA 02110.

DOCUMENTS REQUESTED

1. All documents produced by Aviva to Plaintiff's counsel as stated by Aviva in Defendant Aviva USA Corporation's Statement Pursuant to Local Rule 16.1 dated November 22, 2004.

DAVID M. SCOLL,

By his attorneys,



George C. Rockas, BBO#544009
Sara Discepolo, BBO # 628721
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP
155 Federal Street
Boston, MA 02110
(617) 422-5300
Dated: December 3, 2004

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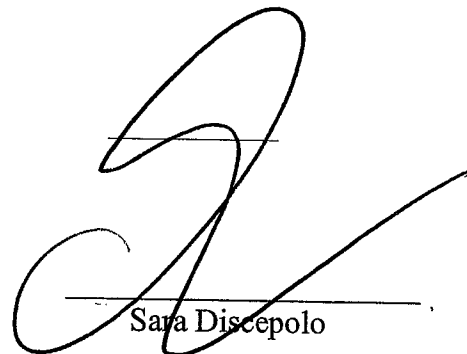
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CERTIFICATE OF SERVICE

I, Sara Discepolo, hereby certify that on December 3, 2004, I served the foregoing *DEFENDANT DAVID M. SCOLL'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO CO-DEFENDANT AVIVA USA CORPORATION* on all parties/counsel of record by mailing the same via first class mail, postage prepaid, to the following:

Christine S. Collins, Esq.
Bowditch & Dewey
311 Main Street
PO Box 15156
Worcester, MA 01615-0156

Kristin M. Knuuttila
Prince, Lobel, Glovsky & Tye LLP
585 Commercial Street
Boston, MA 02109



Sara Discepolo